

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

COACH, INC. and COACH SERVICES, INC.,	:	
	:	
Plaintiffs,	:	Case No. 4:10-cv-2289-RWS
	:	
v.	:	
	:	
FRISON FLEA MARKET, INC., JACK FRISON,	:	
SOUKEYE F. SAMB,	:	
	:	
Defendants.	:	

**JOINT MOTION TO APPROVE PROPOSED AGREED
CONSENT JUDGMENT AND PERMANENT INJUNCTION**

Plaintiffs Coach, Inc. and Coach Services, Inc. and Defendants Frison Flea Market, Inc., Jack Frison, and Soukeye F. Samb (the “parties”) jointly bring this Motion to Approve Proposed Consent Judgment and Permanent Injunction. In support thereof, the Parties state as follows:

1. On December 6, 2010, Plaintiffs filed an action against Defendants, alleging, *inter alia*, trademark infringement and counterfeiting under the Lanham Act.
2. The Parties, as a settlement of all claims between them, have agreed to a consent judgment and permanent injunction. A true and correct copy of the Proposed Agreed Consent Judgment and Permanent Injunction is attached hereto as **Exhibit A**.

WHEREFORE, the parties respectfully request that this Court enter the Consent Judgment and Permanent Injunction attached as Exhibit A to this motion, and for such other and further relief as this Court deems appropriate.

Dated: May 22, 2015

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I have filed the within and foregoing document through the CM/ECF system on this 22nd day of May, 2015, and that a copy will be delivered to counsel of record for all parties in this action who are registered with the CM/ECF system.

/s/ Jason A. Kempf _____